

Transmitted by the expert from IMMA

Informal document GRE-82-37
(82nd GRE, 22-25 October 2019,
agenda item 7 (b))



IMMA comments on GRE-82-22

82nd GRE session (22-25 October 2019)

Comments on GRE-82-22

II. Justification

1. ECE/TRANS/WP.29/2019/80 fails to justify why the proposed transitional period is required. Unjustified transitional period delays the implementation of requirements aimed at improving the vehicle safety.

IMMA: The transitional provisions aim to allow lead time to address **unique technical difficulties for motorcycles** when implementing DRL auto-switch (sensor placement in instrument cluster rather windscreen as for cars). Additionally, noting significant **differences between motorcycle configurations**, which may require **model-specific calibration and testing**.

2. As regards the new automatic passing-beam switching requirement, which is one of the key features of 03 series of amendments to UN Regulation 53, the implementation lead-time is not required given that the scope of the amendments is restricted to L3 vehicles equipped with DRL only.

IMMA: Manufacturers have been voluntarily installing DRL on a number of models for many years.

The 03 series of amendments introduces a new requirement to **automatically switch between DRL and dipped-beam headlamp** based on specified ambient lighting conditions.

Motorcycles fitted with DRL **will need to be redesigned and calibrated** to meet the new R53.03 requirements.

3. However, with a view to allow the industry to comply with other requirements introduced by 03 series of amendments to UN Regulation 53, the transition period is set to 1 September 2021.

IMMA would like to request clarification on the above statement:

- In IMMA understanding, 03 series of amendments is limited to the introduction of **the new DRL auto-switch**, which require **a transitional period to 1 September 2023**.
- Any **other** amendments included in **WP.29/2019/80** correspond to **Supplement 3 to the 02 series** to avoid legal uncertainty.

History

- 77/GRE (April 2017)
 - GRE/2016/35 (Japan): Introducing DRL Auto-Switch, with a proposed period of 48 months Transitional Provisions.
 - GRE-77-17 (Italy): About the technical difficulties of introducing DRL Auto-switch on motorcycles.
 - Decision to establish DRL-L special interest group, which started exchanging subsequently, involving EC, UK, NL, JP, IND, IMMA among others.
- 79/GRE (April 2018)
 - GRE/2018/19 (DRL-L): Result of the DRL-L special interest group to regulate DRL for motorcycles.
 - 48 months of Transitional Provisions.
- 80/GRE (October 2018)
 - GRE/2018/50 (DRL-L): Updated version of GRE/2018/19.
 - A transitional period for DRL auto-switch was set until 1 September 2023.
 - Agreed at 80/GRE.
- 81/GRE (April 2019)
 - GRE/2019/12 (IMMA):
 - Proposal to correct §5.11.2 (AHO) to its original requirement.
 - GRE/2018/50 as amended by GRE/2019/12 adopted by GRE with unchanged TPs.

Transitional Provisions

Current situation:

- R48.05 (cars):
 - 48 months Transitional Provisions.
(66 months M1/N1 & 84 months for other categories, when applying alternative conditions, e.g. tell tale, ...)
 - R53.03 (motorcycles):
 - Expected adoption at November WP.29 → Entry into force June 2020
 - September 2023: Expiry date of Transitional Provisions
- = **40** months,
Shorter Transitional Provisions as for cars, even if technically more challenging

GRE-82-22 proposal (October 2019):

GRE-82-22 proposes to reduce the Transitional Provisions to September 2021.

If GRE agreed by means of a formal amendment (April 2020 83/GRE), the document would be submitted to November 2020 WP.29, with Entry into force June 2021.

This is very close to the proposed end of Transitional Provisions of September 2021.

= **almost no lead time available**

Technical difficulties

For **cars/trucks**, light sensors are mounted inside the cabin, typically near the rear-view mirror, behind the windshield cleaned by wipers.

The sensor is forward facing and angled to give an unobstructed line-of-sight view to the sky to measure ambient lighting conditions.



Differently from cars, for **motorcycles** the most appropriate location is integration into the instrument cluster.

Complications:

- Lack of a wiper mechanism to keep the sensor clean.
- Not all motorcycles have a windshield to protect against contamination.
- The sensor can be obscured by the rider and fairing.
- Each model requiring dedicated integration and calibration.



Motorcycle with Cockpit and Windscreen – Instruments Directly Face the Rider (sensor therefore in shadow)

Conclusion

- Shortening the currently foreseen Transitional Provisions is not appropriate as it would not provide the necessary time to solve these **technical challenges**.
- In the proposal for adoption by WP.29 in November 2019 (WP.29/2019/80), the Transitional Provisions foreseen for implementation of DRL Auto-switch on motorcycles are **shorter than** the ones that were allowed **for cars**, even if motorcycles have a lot more **technical challenges** associated with implementing DRL Auto-switch.
- IMMA requests to **keep the Transitional Provisions**, as agreed at 80/GRE and 81/GRE.

Thank you